RECEIVED

BROOKS, PIERCE, MCLENDON, HUMPHREY & LEONARD, L.L. RUL - 8 1997

ATTORNEYS AT LAW

RALEIGH, NORTH CAROLINA

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

L.P. McLENDON, J.R.
HUBERT HUMPHREY
EDGAR B. FISHER, JR.
W. ERWIN FULLER, JR.
JAMES T. WILLIAMS, JR.
WADE H. HARGROVE
M. DANIE'. McGINN
M.CHAEL D. MEEKER
WILLIAM G. MCNAIRY
EDWARD C. WINSLOW III
HOWARD L. WILLIAMS
ECORGE W. HOUSE
WILLIAM F.H. CARY
REI'DL, PHILLIPS
JOHN H. SMALL
RANCALL A. JUNDERWOOD
S. LEIGH RODENBOUGH IV
WILLIAM G. ROSS, JR.
MARK J. PRAK
JILL R. WILSON
MARK D. BISHOP
JIM W. PHILLIPS, JR.
MACK SPERLING
JEFFREY E. OLEYNIK
MARK DAVIDSON
MELISSA H. WEAVER
JAMES R. SAINTSING
JOHN W. ORMAND III

ROBERT J. KING III
STEVEN J. LEVITAS
V. RANDALL TINSLEY
JOHN R. ARCHAMBAULT
S. KYLE WOOSLEY
WILLIAM C. SCOTT
DANIEL M. SROKA
FORREST W. CAMPBELL. JR.
MARCUS W. TRATHEN
JEAN C. BREONES
ANNE C. BRENNAN
ELLEN P. HAMRICK
ALLSON M. GRIMM
JAMES C. ADAMS, II
ELIZABETH S. BREWINGTON
JOHN K. EASON
WAYNE A. LOGAN
H. ARTHUR BOLICK II
NATASWA RATH MARCUS
ELIZABETH FAECHER CRABILL
JOHN M. CROSS, JR.
WINSTON P. LOYO
EDWARD S. MEDINA
JENNIFER K. VAN ZANT
W. KEARNS DAVIS, JR.
TRACEY BANKS COAN
DAVID W. SAP
BRIAN J. SAP

KATHLEEN M. THORNTON

MAILING ADDRESS POST OFFICE BOX 1800 RALEIGH, N.C. 27602 STREET ADDRESS SUDCERETATION COPY ORIGINAL

TELEPHONE 919-839-0300 FACSIMILE 919-839-0304 AUBREY L. BROOKS (1872-1866)
W.M. MOLDERNESS (1904-1966)
L.P. MELENDON (1890-1969)
KENNETH M. BRIM (1908-1974)
C.T. LEONARO, JR. (1929-1983)
GLAUGE C. PIERCE (1913-1988)
THORNTON H. BROOKS (1912-1888)
G. NEIL DANIELS (1911-1987)

GREENSBORÓ ÓFFICE 2000 RENAISSANCE PLAZA GREENSBORO, N.C. 27401

WASHINGTON OFFICE 2000 L STREET N.W., SUITE 200 WASHINGTON, D.C. 20036

July 8, 1997

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W., Stop Code - 1170

Washington, D.C. 20554

Re: MM Docket Nos. 91-221; 87-8; 94-150; 92-51; 87-154

TV LMA's

Dear Mr. Caton:

Transmitted herewith, on behalf of The Hearst Corporation, is a facsimile of an original and four copies of a response to the request for information regarding television LMA's set forth in the Commission's <u>Public Notice</u> released June 17, 1997.

Hearst is the licensee of Television Station KMBC-TV, Kansas City, Missouri. In addition, Hearst is a party to a Program Service and Time Brokerage Agreement ("LMA") with KCWB-TV, Inc., permittee of Television Station KCWB(TV), Kansas City, Missouri. Hearst provides programming and other services to KCWB-TV, Inc. pursant to the LMA.

If any questions should arise during the course of your consideration of this information, it is respectfully requested that you communicate with this office.

Sincerely,

BROOKS; PIERCE, McLENDON, HUMPHREY & DEONARD, L.L.P.

Mark J. Prak

Counsel to The Hearst Corporation

No. of Copies rec'd List ABCDE

MJP/kws Enclosures c/word/bearst/kcwb/wtc7897

EXHIBIT A

PUBLIC INTEREST BENEFITS

Under its Program Service and Time Brokerage Agreement ("LMA") with KCWB-TV, Inc., permittee of Television Station KCWB(TV), Kansas City, Missouri, The Hearst Corporation, licensee of Television Station KMBC(TV), Kansas City, Missouri, has been able to provide a variety of public interest benefits to the people of Kansas City and the surrounding area. These public interest benefits include the offering of new and diverse programming which was previously unavailable in the market.

KCWB is an affiliate of the Warner Brothers Network. Prior to the LMA and construction of KCWB, Warner Brothers was without an affiliate in the Kansas City market. KCWB currently provides approximately thirty-six (36) hours of children's programming per week. Under the new FCC Children's Programming Rules, which become effective in September, KCWB will broadcast approximately ten (10) hours per week of programming which will qualify as educational and informational children's programming.

In addition to its exceptional record of serving the needs of children, KCWB also serves as the flagship station for Kansas City Royals baseball, providing thirty-five games to the market each season. KCWB broadcasts a number of first-run syndicated programs that would otherwise be unavailable in the market. KCWB also provides several religious and informational programs and four hours of Bloomberg business news and financial information during the late-night/early morning hours.

KCWB's relationship with The Hearst Corporation and KMBC also allows KCWB to provide an additional outlet for KMBC's local news specials and weekly public affairs programming. Hearst is also a leader in developing local programs designed for children, teens, and young adults.

The LMA with KCWB has allowed Hearst to offer additional diverse programming to the public. The additional advertising inventory has allowed Hearst to better serve the needs of advertisers in Kansas City as well. None of these public interest benefits existed prior to Hearst's investment in its LMA with KCWB-TV, Inc.

LMA REPLY FORM

| MARKET: | Kansas City, Missouri | | | DMA#:32 | | | |
|-----------------------|-----------------------|-------------|-------------|---------------------------|-----------------------------------|---|--|
| | Channel No. | Network | Licensed | Owner/ | Approximate Degree of Overlap (%) | Nielsen (all day) Audience Share (9am-midnight) | |
| | & Call Sign | Affiliation | Community | Licensee | City Grade Grade Grade A B | 11/96 2/97 5/97 | |
| Brokered Station: | KCWB Channel 29 | WB | Kansas City | KCWB-TV, Inc. | 100 100 93 | 1 2 3 | |
| Brokering Station: | KMBC-TV Channel 9 | ABC | Kansas City | The Hearst Corporation | 100 100 100 | 19 17 18 | |
| | | | | | | | |

| LMA Specifics: | Date of LMA Signing | Length of Initial <u>Term</u> | Initial Term <u>Start Date</u> | Initial Term <u>End Date</u> | Renewal Provisions/Terms Describe renewal provisions including: (1) length of renewal, (2) at which party's option, (3) whether renewal is automatic, and (4) how renewal option may be exercised. | % Time Brokered per week |
|-------------------|---------------------------|-------------------------------------|--------------------------------------|------------------------------------|---|--|
| | August 24, 1995 | 5 years | September 14, 1996 | September 14, 2001 | Five year renewal at option of Broker, Hearst Corporation. Renewal term would run through 9/14/2006. Option renewed automatically upon notice by Broker to Licensee. | 98% with 4 hour licensee holdback for public affairs and licensee preemption authority |

Public Interest Benefits: See Exhibit A Attached Hereto